



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CCC:MEM/JAM
F. #2017R00509

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 2, 2022

By ECF

The Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Karl Jordan, Jr., also known as “Little D” and “Noid,”
Criminal Docket No. 20-CR-305 (LDH) (S-1)

Dear Judge DeArcy Hall:

The government respectfully submits this letter in response to the Court’s February 28, 2022 order, directing the government to “apprise the Court of the dates of the photographs referenced on page 4 of the Government’s submission,” which detail videos and photographs of the defendant: (1) holding stacks of hundred dollar bills and other denominations of money; and (2) wearing and examining diamond-encrusted jewelry. More specifically the Court asked, “whether any of the photographs or videos of Mr. Jordan holding stacks of 100-dollar bills and other denominations, [or] diamond encrusted jewelry, predate 2018.” Tr. at 41-42. As noted in the government’s submission and during the February 28, 2022 detention hearing, these images and videos were recovered from mobile phones seized from Jordan incident to his arrest and searched pursuant to court-authorized search warrants.¹ The government writes to inform the Court that some of those images pre-date the defendant’s April 2018 settlement.

While some images pre-date the settlement, it appears that the majority of those images post-date the settlement, in that they have a “date modified” between approximately May 2018 and July 2020.² The reason the government cannot state with certainty that those

¹ These materials were produced to the defendant on March 22, 2021.

² The defendant’s bank records reflect large cash withdrawals between \$9,000 and \$20,000 subsequent to a \$115,990 deposit made on April 10, 2018, which is presumably the referenced settlement payment.

images post-date the settlement is because according to forensic experts, the “date modified” listed in the forensic extraction report could refer to the date of creation; the date of download to the device; the date the file was altered and saved; the date the file was re-formatted and transferred to another party; or the date the file was last accessed. That being said, the government can state with certainty that at least some of the images referenced on page 4 of the government’s submission pre-date the set.

The government remains prepared to answer any further questions the Court may have regarding the information contained herein.

Respectfully submitted,

BREON PEACE
United States Attorney

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cc: All Counsel of Record (by ECF)